

Pollution Prevention Program Planning Law

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TCEQ Pollution Prevention & Education

What is Pollution Prevention (P2)?

- ▶ Pollution Prevention is a method of analyzing and modifying processes and inputs in an effort to minimize non-product outputs.

The Story of P2

- ▶ 1990 Federal Pollution Prevention Act
- ▶ 1991 Texas Senate Bill 1099 = Waste Reduction Policy Act (WRPA)
- ▶ Title 30 Texas Administrative Code Chapter 335, Subchapter Q (§335.471–480)



WRPA Created

Government in cooperation with:

- Industry representatives
- Public interest groups
- Educational organizations



Together they created a pollution prevention program that has a positive impact on industry as well as the environment.

SOURCE REDUCTION

30 TAC §335.471(13)

Occurs **before** a waste has been “generated” or created (prior to recycling)

Examples

- ▶ Equipment and technology modifications
- ▶ Procedural changes
 - Batch scheduling
- ▶ Reformulation or redesign of products
 - Raw material substitutions

WASTE MINIMIZATION

30 TAC §335.471(16)

Occurs **after** a waste has been “generated” or created

Examples include:

- ▶ Reuse
 - ▶ Recycle
 - ▶ Neutralization
 - ▶ Reclassification
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How the P2 Program Works

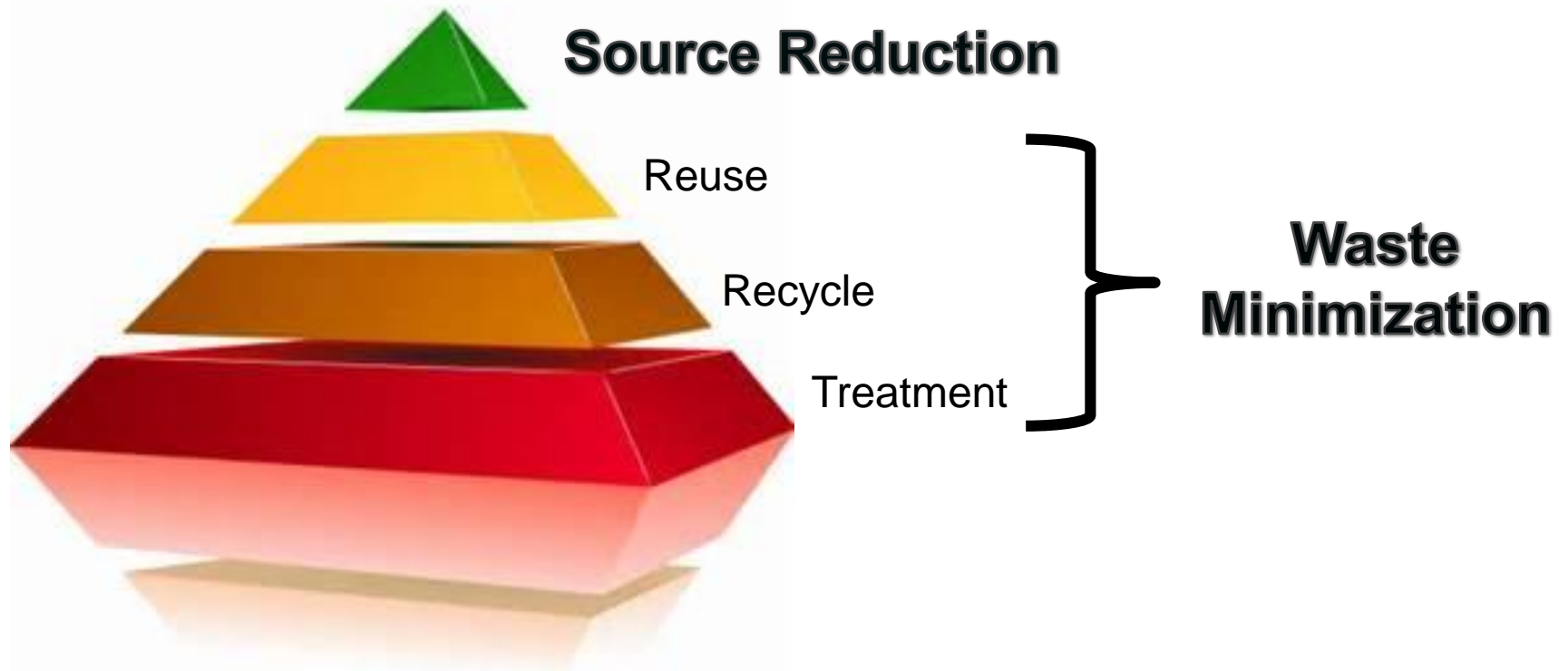
Sites go through the process to:

- Identify wastes
 - Identify options
 - Evaluate economics
-
- Pollution Prevention Plan and Executive Summary

P2 Planning Process

- ▶ **Identify** your Pollutants,
- ▶ **Identify** the Activities
- ▶ **Prioritize** Pollutants
- ▶ **Prioritize** P2 Projects
 - Economic
 - Technical
 - Risks
 - Reductions
 - Schedule
- ▶ **Measurable** Goals
- ▶ **Employee Awareness and Training**
- ▶ **Media Transfer**
- ▶ **Document** your Plan
- ▶ **Measure** your Results

Waste Hierarchy



The higher you go on this pyramid, the more time, money, labor, liability, etc. you can save!

Why It Works

Reducing waste:

- ▶ Saves money
- ▶ Reduces regulatory burden



Steel Foundry Success

- ▶ Steel recycling process generates a large volume of hazardous waste.
- ▶ High transportation and disposal costs
- ▶ Implemented process improvements & employee training to maximize efficiency



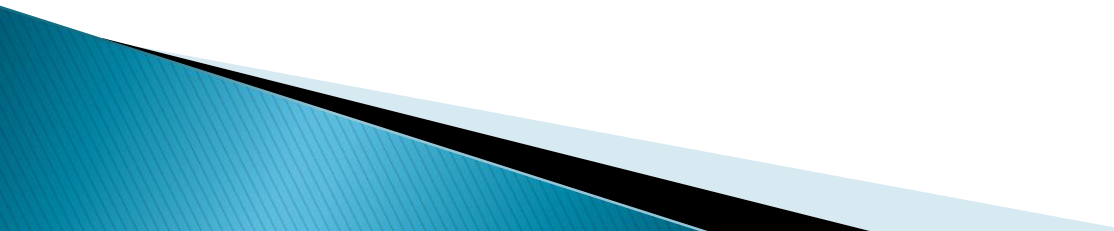
4K Tons Reduced! \$700K saved!

Reduce Regulation

Hazardous waste generation. . . .

- LQG ($> 2,200$ lbs/month) = 88 requirements
- SQG (220 to 2,200 lbs/month) = 74
- CESQG (≤ 220 lbs/month) = ONLY 4

Pollution Prevention: The Rule

- ▶ Who does it apply to?
 - ▶ Who does it **NOT** apply to?
 - ▶ What is required?
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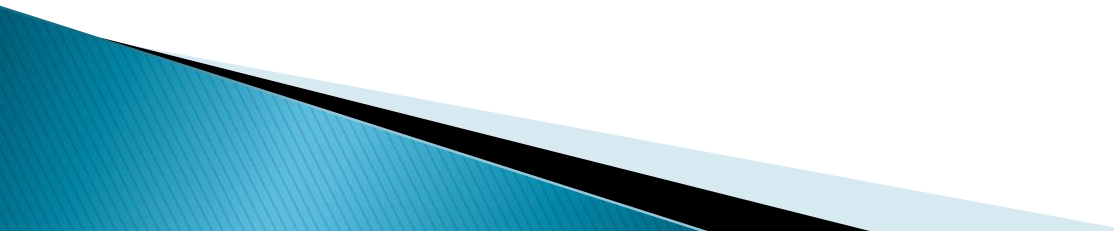
P2 Applicability

30 TAC Chapter 335 Subchapter Q applies to:

- ▶ All TRI Form R reporters
- ▶ Hazardous waste generators
 - Large Quantity Generators (LQG)
 - Small Quantity Generators (SQG)

P2 Applicability cont.

. . . and does **NOT** apply to:

- ▶ TRI Form A reporters who are not LQG or SQG
 - ▶ Conditionally Exempt Small Quantity Generators (CESQG) who **DO NOT** report TRI Form R
 - ▶ Sites regulated **ONLY** by the Railroad Commission
- 

Exemptions

Sites only reporting because of remediation

- granted on an annual case-by-case basis
- generally done for 1-time remediation projects



Sites with an EMS

Environmental Management System rules:

- No longer requires complicated annual reporting
- Entities with an eligible EMS may be approved to receive certain incentives from the TCEQ
 - 10% Compliance History credit
 - Single point-of-contact within the TCEQ for innovative activities
 - Individualized technical assistance

P2 Requirements

Prepare 5-year Pollution Prevention (P2) Plan

- Renew every 5 years
 - Always due on January 1st
- Keep available on site
 - Let more than one person know where it is

P2 Requirements cont.

Submit Executive Summary of P2 Plan to TCEQ

- With Certificate of Completeness and Correctness
- Signed by someone who can commit corporate resources to the projects
 - Site owner
 - Site manager
 - Corporate officer
 - EHS manger
- **Keep proof of submittal with your copy of the Plan.**



P2 Requirements cont.

Submit Annual Progress Report

- LQGs and TRI Form R reporters ONLY

Annual Progress Report

- ▶ Due by July 1st covering the previous calendar year
- ▶ Submit online through STEERS (May 15–July 1)
or
- ▶ Submit “hard” copy
via mail: TCEQ Pollution Prevention
MC – 108
P.O. Box 13087
Austin, TX 78711–3087

via email: p2@tceq.texas.gov

SQG/Non-TRI R

- ▶ If Small Quantity Generator & not TRI Form R
 - No Annual Progress Report
 - Not required in P2 Plan
 - Employee awareness training (but a good idea)
 - Address release of different pollutant, or media transfer

New-Comers

- ▶ Site that becomes subject to the P2 planning requirements has **90 days** to put a P2 Plan in place
 - Keep a copy on site and send an Executive Summary to TCEQ

Why Comply?

- ▶ Economic benefits
- ▶ Reduced regulatory burden
- ▶ Protect the environment
- ▶ Public relations



Enforcement

- ▶ Violations of 30 TAC Chapter 335 Subchapter Q:
 - Failure to have complete P2 Plan available on site
 - Failure to submit Executive Summary of P2 plan
 - Failure to keep the Executive Summary updated
 - Failure to submit Annual Progress Report



WRPA Results

Reductions since 1998*:

- ▶ Almost 20 million tons of Hazardous Waste
- ▶ Almost 5 million tons of TRI Chemicals

*Results taken from the Annual Progress Reports from 1998-2017

Need Assistance?



Visit P2Plan.org

Org Chart | A to Z index | Search Site | Search

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You are here: Home / Pollution Prevention Resources / Waste Reduction Policy Act / About Pollution Prevention (P2) Planning

About Pollution Prevention (P2) Planning

A portal to resources available for the Waste Reduction Policy Act and pollution prevention planning.

P²Plan.org
Pollution Prevention Resources for the State of Texas

| Annual Progress Report | Online P2 Annual Progress Reporting (STEERS)|

| Pollution Prevention Workshops | P2 Planner Options | Example P2 Plans |

Documents on this page are in various file formats (Help downloading files.)

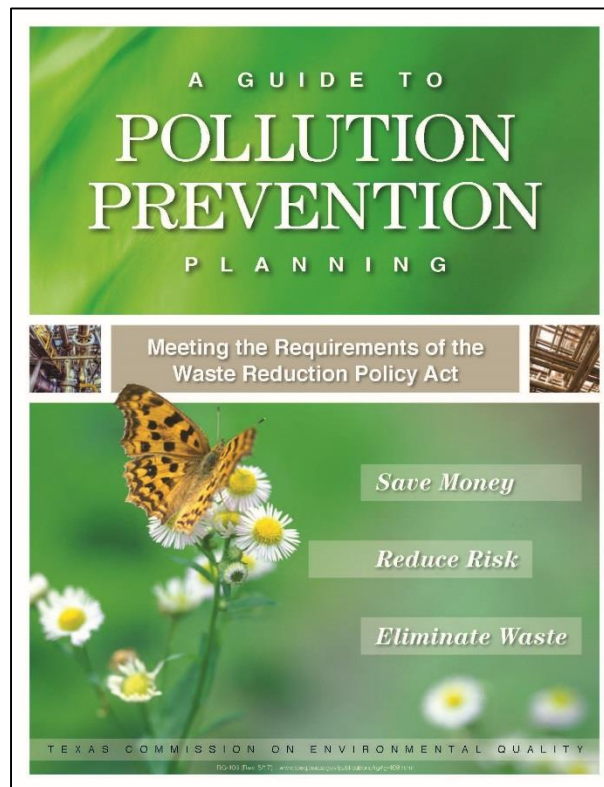
WRPA
Background about the Waste Reduction Policy Act, its requirements, and resources to help you get the most from planning.
Pollution Prevention Planning
Use the Pollution Prevention Planning Guide to meet the WRPA requirements while reducing risks, eliminating waste, and saving money!
P2 Executive Summary
Worksheet 6 (Word) or Worksheet 6 (PDF) will help

Hot Topics
NEW 2017 P2WM Workshop
The 2017 Pollution Prevention and Waste Management Workshop has been scheduled for September 20. Registration is now open. The one day workshop will cover topics from WRPA, TRI, Hazardous Waste, and more! Registration has been a sell out every year so check out the P2WM Workshop webpage for more information!
NEW New and Improved RG-409
The Pollution Prevention Planning Guide (RG-409) has been fully revised but still takes you through the process of preparing a P2 Plan. Take a look at the all new RG-409!

Resources
Reduce Waste and Save Money! Use these links to enhance your P2 efforts!
P2 Resources
These tools can help increase the effectiveness of your pollution prevention plans.
P2 Planner
Use this interactive tool to help prepare your P2 Plan and Executive Summary.

The New and Improved RG-409

We've revised our Guidance Document!
Check it out!!



Contact

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Other Contacts

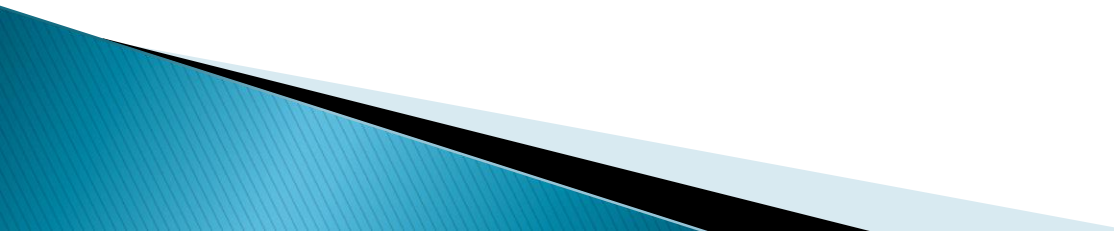
- **Gill Camps, RENEW**

- Phone: 512-239-1365

- Email: p2@tceq.texas.gov –or–
Gill.Camps@tceq.texas.gov

- **Small Business and Local Government Assistance (SBLGA) Hotline**

- 1-800-447-2827



Questions?

